

**IN THE U.S. DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

April Parchman, as administrator ad litem of  
the estate of Jeffrey Parchman, deceased,  
individually and on behalf of all others  
similarly situated; and Ann Parchman,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

SLM Corporation, Navient Corporation,  
Navient Solutions Inc., f/k/a Sallie Mae Inc.,  
and Sallie Mae Bank,

Defendants.

Case No: 2:15-cv-02819-JTF-CGC

---

**JOINT MOTION REGARDING MOTIONS TO COMPEL**

---

Plaintiff April Parchman (“Plaintiff”), Defendant Sallie Mae Bank (“SMB”), Defendant SLM Corporation (“SLM”), Defendant Navient Corporation, and Defendant Navient Solutions LLC (“NSL”) (collectively, the “Parties”)<sup>1</sup> hereby respectfully request that the Court stay motions practice on pending motions to compel filed by Plaintiff. In support of this Motion, the Parties state as follows:

1. On July 9, 2020 Plaintiff filed a Motion to Deem Requests for Admission to Defendant Sallie Mae Bank Admitted [Dkt. 164].

---

<sup>1</sup> NSL was formerly known as Navient Solutions, Inc. (“NSI”). To avoid confusion, NSL and NSI are collectively referred to herein as “NSL.”

2. On July 9, 2020, Plaintiff filed a Motion to Compel Discovery from Defendant Navient Solutions, LLC (NSL) and to Deem Requests for Admission Admitted [Dkt. 165].

3. After the filing of such motions, the parties conferred on the merits of the motions and began exploring whether the disputes could be eliminated or narrowed before defendants submitted their respective responses. [See Dkts. 172, 173, 176 and 180].

4. On July 17, 2020, NSL filed a Motion for Entry of Proposed Protective Order [Dkt. 168] requesting that the motion to compel discovery from it [Dkt. 165] be stayed pending a ruling on its forthcoming motion for summary judgment.

5. On September 11, 2020, SMB and SLM filed their motion for summary judgment [Dkt. 189]. On October 9, 2020, Plaintiff filed her response to the motion [Dkt. 197]. A granting of this motion for summary judgment would moot the motion to compel aimed at SMB.

6. On September 11, 2020, NSL and Navient Corporation filed their motion for summary judgment [Dkt. 188]. On October 9, 2020, Plaintiff filed her response to the motion for summary judgment [Dkt. 196]. A granting of the motion for summary judgment would moot the motion to compel aimed at NSL. A denial of the motion for summary judgment would result in NSL responding to the discovery served upon it, thereby mooting the motion to compel.

7. Defendants have moved for an extension until November 5, 2020 to submit their replies to the motions for summary judgment [Dkt. 202].

8. The parties agree that it is in the best interest of judicial efficiency to stay the motions to compel pending a resolution of the pending motions for summary judgment.

WHEREFORE, the Parties move for the entry of the enclosed protective order to stay motions practice on Plaintiffs' motions to compel.

Respectfully submitted this 27th day of October, 2020.

/s/ Lisa M. Simonetti

LISA M. SIMONETTI

GREENBERG TRAURIG, LLP  
1840 Century Park East, Suite 1900  
Los Angeles, California 90067-2121  
simonettl@gtlaw.com  
Telephone: 310.586.7700  
Facsimile: 310.586.7800

Odell Horton, Jr.  
Wyatt Tarrant & Combs  
1715 Aaron Brenner Drive, Suite 800  
Memphis, TN 38120  
ohorton@wyattfirm.com  
Telephone: 901.537.1082

*Attorneys for Defendant Navient Solutions, LLC*

**CERTIFICATE OF CONSULTATION**

In accordance with LR 7.2(a)(1)(B), counsel for the parties conferred regarding this motion on October 14, 16, and 20 - 21.

/s/ Lisa M. Simonetti

**CERTIFICATE OF SERVICE**

I hereby certify that on October 27, 2020, the foregoing was filed using the CM/ECF filing system which will send notification to the following:

Benjamin J. Miller  
Sarah Calk  
The Higgins Firm, PLLC  
525 4th Ave S  
Nashville, TN 37210  
[ben@higginsfirm.com](mailto:ben@higginsfirm.com)  
[scalk@higginsfirm.com](mailto:scalk@higginsfirm.com)

*Counsel for Plaintiff*

By: /s/ Lisa M. Simonetti